III. REMARKS

Claim 1 has been amended

Claims 1, 2, 4, 5, 24-26 and 28-33 are patentable under 35 U.S.C. 102(e) over Pyotsia et al., U.S. Patent No. 6,879,940 ("Pyotsia"). Claim 1 recites that at least a portion of a content of the different data is not present in the first data. It is noted that the above language added to claim 1 is supported in the specification at, as a non-limiting example, page 14, line 26 through page 15, line 2 and page 16, line 6 through page 17, line 26 of Applicant's specification. The above noted feature of claim 1 is not disclosed or suggested by Pyotsia.

Pyotsia discloses remotely controlling, configuring or monitoring field devices with a general purpose mobile terminal (Col. 3, L. 6-10). In Pyotsia the WWW server 23 responds to the requests by sending the requested WWW pages to the gateway 25 which forwards the WWW pages to the browser in the mobile terminal MT. The gateway 25 may also include a translation or conversion between the different content formats or protocols to enable the WWW page to be viewed on the simplified operating system of the mobile terminal MT (Col. 6, L. 19-25). For example, Pyotsia recites that the most promising method for providing a standard mobile terminal MT with an Internet capability is a Wireless Application Protocol, WAP. WAP defines a set of standard components that enable communication between mobile terminals and WWW servers. (See Col. 6, L. 42-62).

There is absolutely no disclosure in Pyotsia that the at least a portion of a content of the different data is not present in the first data as recited in Applicant's claim 1. This language in

Applicant's claim 1 calls for something more than "the different data" being "considered data resulting from or based on a processing of the 'first data' by the 'module'" which is all that Pyotsia discloses. In Pyotsia the diagnostic system 21 is provided with an interactive user interface which utilizes the configuration, control and management data in the database 22 and is accessible by the mobile terminal MT through a dedicated data connection established over a cellular communication system 26, in order to selectively control, configure or monitor the filed devices 14, 15, 16 connected to the diagnostic system 21 (Col. 5, L. 43-53). Thus, Pyotsia merely discloses the translation of data from one format to another so that the data from the WWW server may be viewed on a mobile terminal and nothing more (see also Col. 7, L. 4-20). Therefore, claim 1 is patentable over Pyotsia because Pyotsia does not disclose or suggest that the at least a portion of a content of the different data is not present in the first data as recited in Applicant's claim 1.

Claims 2, 4, 5, and 33 depend from claim 1 and are patentable at least by reason of their respective dependencies.

Claims 25, 26 and 28-32 depend from claim 24 and are patentable at least by reason of their respective dependencies.

Further, claim 30 recites that the local network is configured to receive and display a suggestion from the user on the remote network regarding the operation of the equipment being monitored on the local network. Nowhere is this feature disclosed or suggested in Pyotsia. The Examiner refers to column 6, line 63 through column 7, line 67 of Pyotsia as disclosing this feature, however all that this cited portion of Pyotsia discloses is the translation of data from one protocol to another and the creation of interactive WWW pages and nothing more. All that is disclosed

in Pyotsia is the control of a field device through in interactive WWW page displayed on the mobile terminal. There is no disclosure anywhere in Pyotsia "that the local network is configured to receive and display a suggestion from the user on the remote network regarding the operation of the equipment being monitored on the local network."

Claims 6, 7, 9-13, 15-19 and 34 are patentable under 35 U.S.C. 103(a) over Pyotsia. Claim 6 calls for the module being configured to allow one of the plurality of users to select at least one equipment diagnostic monitor system from a plurality of equipment diagnostic monitoring systems. This feature is neither disclosed nor suggested in Pyotsia. Thus, claim 6 is patentable. Claims 7, 9, 10 and 34 depend from claim 6 are patentable at least by reason of their respective dependencies.

Thus, claim 11 is patentable. Claims 12, 13 and 15-19 depend from claim 11 and are patentable at least by reason of their respective dependencies.

Further, claim 17 recites the user on the remote network sends a suggestion regarding an operation of the at least one item being monitored to an entity managing the at least one item on the local network. This feature is not disclosed or suggested by Pyotsia for reasons that are substantially similar to those described above with respect to claim 30. Thus, claim 17 is patentable.

Claim 19 recites a remote control proxy server in the intermediate network that is between the local network and the remote network that prevents direct IP routing of a device in the local network that is being accessed by the remote network. This feature is not disclosed or suggested in Pyotsia. All that is

disclosed in Pyotsia is that the "WAP inherently provides a connection security between the MT and the WWW server 33. The system has [only] to assure that the user is an authorized user." (Col. 7, L. 22-30). Thus, all Pyotsia provides for is the authentication of the user and nothing more. The mere provision of "connection security" in Pyotsia in no way discloses or suggests "preventing direct IP routing" as recited in Applicant's claim 19. Thus, claim 19 is patentable.

Claims 3, 8, 14 and 27 are patentable under 35 U.S.C. 103(a) over Pyotsia and Reid et al., U.S. Patent No. 6,182,226 ("Reid"). Claims 3, 8, 14 and 27 ultimately depend from claims 1, 6, 11 and 24 respectively. It is respectfully submitted that because Pyotsia fails to disclose or suggest all the features of claims 1, 6, 11 and 24 that the combination of Pyotsia and Reid cannot as well. Therefore, claims 3, 8, 14 and 27 are patentable at least by reason of their respective dependencies.

Claims 20-23, 35, and 36 are patentable under 35 U.S.C. 103(a) over Pyotsia and Crist et al., U.S. Patent No. 6,879,940 ("Crist"). Claims 20-23 and 36 depend from claim 11 and claim 35 depends from claim 1. It is submitted that because Pyotsia fails to disclose or suggest all the features of claims 1 and 11 that the combination of Pyotsia and Crist cannot as well. Therefore, claims 20-23, 35, and 36 are patentable at least by reason of their respective dependencies.

Further, claim 21 recites that the intermediate network further comprises an equipment diagnostic monitor system that monitors and analyses the semiconductor tool. Neither Pyotsia nor Crist discloses testing a semiconductor tool as recited by Applicant. It is asserted in the Office Action that Crist discloses monitoring and analyzing a semiconductor tool however Crist

merely discloses nothing more than the remote testing of integrated circuits and not the tools used to make the semiconductors (Col. 4, L. 48-51). The test system (8) in Crist is itself "a machine or machines and any associated ancillary equipment used in semiconductor circuit testing" (Col. 4, L. 27-29). Thus, claim 21 is patentable. This argument applies equally to claim 35.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,

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